

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**SECOND STIPULATION AND ORDER ADJOURNING THE HEARING AND  
EXTENDING THE OBJECTION DEADLINE ON THE TRUSTEE’S MOTION AND  
MEMORANDUM OF LAW TO AFFIRM HIS DETERMINATIONS DENYING THE  
CLAIMS OF NEIL E. BOTWINOFF, ROBERT E. HELPERN, JOEL S. HIRSCHTRITT,  
RALPH A. SICILIANO, VINCENT J. SYRACUSE AND MICHAEL G. TANNENBAUM**

Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, and the chapter 7 estate of Bernard L. Madoff, on the one hand, and Neil E. Botwinoff, Robert E. Helpern, Joel S. Hirschtritt, Ralph A. Siciliano, Vincent J. Syracuse and Michael G. Tannenbaum (collectively, the “Claimants”), on the other hand, through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on December 9, 2019, the Trustee filed his combined motion and memorandum of law to affirm the Trustee’s determinations denying the customer claims filed by the Claimants (the “Motion”) (ECF No. 19202);

WHEREAS, on December 18, 2019, the Court approved the *Stipulation and Order Adjourning the Hearing and Extending the Objection Deadline on the Trustee's Motion and Memorandum of Law to Affirm His Determinations Denying the Claims of Neil E. Botwinoff, Robert E. Helpern, Joel S. Hirschtritt, Ralph A. Siciliano, Vincent J. Syracuse and Michael G. Tannenbaum* (ECF No. 19229);

WHEREAS, the Motion is scheduled to be heard before the Court on March 25, 2020 at 10:00 a.m. (the "Hearing");

WHEREAS, the Claimants have requested a further adjournment of the Hearing and extension of the deadline to object to the Motion;

WHEREAS, the Trustee has consented to one final adjournment and extension; and

**NOW, IT IS HEREBY STIPULATED AND AGREED**, by the undersigned herein that:

1. The Hearing on the Motion shall be adjourned to **April 29, 2020, at 10:00 a.m.**, as the Court's calendar may allow.
2. The deadline for Claimants to file an objection to the Trustee's Motion is hereby extended to and including **March 20, 2020**.
3. The Trustee may file a reply in support of the Motion on or before **April 15, 2020**.
4. This Stipulation may be signed in any number of counterparts and a signature made by a facsimile or electronic copy shall have the same force and effect as an original signature.

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Dated: February 10, 2020  
New York, New York

By: /s/ David J. Sheehan  
David J. Sheehan  
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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the chapter 7 estate of Bernard L.  
Madoff*

Dated: February 10<sup>th</sup>, 2020  
New York, New York

By: /s/ Richard W. Trotter  
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*Attorneys for Neil E. Botwinoff, Robert E.  
Helpen, Joel S. Hirschtitt, Ralph A. Siciliano,  
Vincent J. Syracuse and Michael G. Tannenbaum*

SO ORDERED:

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE